



Legitimate Interests Assessment Form

Although it is not compulsory for an organisation to have a written record of an LIA, the ICO does state that this process does help demonstrate compliance in line with the College's accountability obligations under Articles 5(2) and 24 of the GDPR.

The LIA is a light-touch test complete in three parts.

Department Name	Conference Office
Data Subject(s)	Conference and events attendees, accommodation guests and graduate students
Nature of personal data processed	Contact details from individuals and companies, dietary requirements, rooming lists, contracts, accessibility requirements, financial information.
Special category, criminal offence or children's data?	Yes – information on health and religion taken to accommodate customers dietary and accessibility requirements
Are the data assets recorded in the ROPAs?	Yes
Department Head	Nick French
Assessment Owner	Katherine Tomlinson
Assessment Start date	21/02/2020
Decision Date	28/02/2020

1) Purpose: identify the legitimate interest(s). Consider:	
Why do you want to process the data – what are you trying to achieve?	To provide an event booking and management service. To provide accommodation and meals to customers in accordance with their needs. To advertise the service. To gather feedback in order to improve the service.
Who benefits from the processing? In what way?	The College – data processed to allow the delivery of excellent customer service between departments. The customer – the customer has their event, accommodation and dietary needs met to their expectations.
Are there any wider public benefits to the processing?	No
How important are those benefits?	N/A
What would the impact be if you couldn't go ahead?	The service would be unable to function, leading to loss of revenue to the College from events, meals and accommodation bookings.
Would your use of the data be unethical or unlawful in any way?	No
Have you considered any Tribunal judgements/case law in identifying 'legitimate interests'?	No – none extant.
2) Necessity: apply the necessity test. Consider:	
Does this processing actually help to further that interest?	Yes – data processing is required in order to fulfil the customers requirements.



Is it a reasonable way to go about it?	Yes
Is there another less intrusive way to achieve the same result?	No – the data collected is the minimum required in order to provide the service to the customer.
3) Balancing test: Do the Individual's interests override the legitimate interest?	
What is the nature of your relationship with the individual? Is it pre-existing and have you used their data previously?	Some customers are new and some customers have a pre-existing relationship with the College where their data has been used previously.
How has the data been obtained? If supplied from a third party what did they tell the individual about reuse?	<p>Most data comes directly from the client, sometimes a third party will provide data regarding a conference or event, with the customer's permission.</p> <p>In the case of accommodation bookings SpeedyBooker informs customers that data processing is necessary in order to perform any contract the customer has with them, or for the performance of their contract with the vendor (the College).</p> <p>Speedy Booker also tells customers that they may process their personal data for the purposes of their own legitimate interests provided that those interests do not override any of the customer's interests, rights and freedoms which require the protection of personal data. This includes processing for business development, statistical and management purposes.</p>
Do you have the means and processes to keep the information up to date?	Yes – for example, if a repeat booking is made and the customer details have changed, the changes will be made in the system.
Is any of the data particularly sensitive or private?	Yes – personal data relating to diet and health / disability. This is processed under substantial public interest.
Would people expect you to use their data in this way?	Yes
Are you happy to explain it to them?	Yes
Are some people likely to object or find it intrusive?	<p>It is unlikely for most of the types of data processed.</p> <p>With regards to special category data, some customers may need to further expand on the health / disability information (they have supplied in their initial contact with us) to ensure their needs are adequately met. The booking form only records whether an accessible room is required. The College only has one truly accessible room (adapted for wheelchairs). Some customers simply need a ground floor room. Where necessary, the conference team may need to confirm what types of room modification are required.</p>
What is the possible impact on the individual?	Minimal impact
How big an impact might it have on them?	The impact is likely to be beneficial because data is processed in order for the College to meet their needs.
Are you processing children's data?	No



Are any of the individuals vulnerable in any other way?	Yes – some vulnerable adults may be accommodation customers
Can you adopt any safeguards and technical measures to minimise the impact?	IT security is in-line with the College's Data Security Policy. There is a clear desk policy. Access to the booking system is restricted to staff with a business need-to-know.
Can you offer an opt-out?	For the majority of data processed, the data processed is necessary to provide the service. However, customers are able to request that certain elements are not recorded. For special category data, opting out is the default. There is no requirement for a customer to disclose their accessibility or dietary requirements.

Decision	
Outcome Date	28 February 2020
Outcome	Approved
How was the outcome decided	Reviewed by DPO
Further Action	N/A
Next Review date	February 2021
Agreed by	Roger Boden (DPO)